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Attorneys for Plaintiffs

L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her
guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
Hernandez, individually and as
successor-in-interest to Hector Puga;
A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
to Hector Puga; and ANTONIA SALAS
UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
nominal defendant; ISAIAH KEE;
MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA; ROBERT
VACCARI; JAKE ADAMS; and DOES
6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

*Honorable Kenly Kiya Kato***AMENDED JOINT WITNESS LIST**

5:22-cv-00949-KK-SHK

AMENDED JOINT WITNESS LIST

**TO THE HONORABLE COURT, ALL PARTIES AND THEIR
ATTORNEYS OF RECORD:**

Pursuant to the Court's Civil Trial Scheduling Order, Plaintiffs L.C., a minor by and through her guardian *ad litem* Maria Cadena; I.H., a minor by and through his guardian *ad litem* Jasmine Hernandez; A.L., a minor by and through her guardian *ad litem* Lydia Lopez; and Antonia Salas Ubaldo ("Plaintiffs") and Defendants State of California, by and through the California Highway Patrol, Michael Blackwood, Isaiah Kee, and Bernardo Rubalcava ("State Defendants"), (collectively "the Parties"), hereby submit this Joint Exhibit List for the June 2, 2025 trial.

All parties reserve the right to call any witness listed by another party.

DATED: May 15, 2025

LAW OFFICES OF DALE K. GALIPO

Bv /s/ Hang D. Le
Dale K. Galipo
Hang D. Le
Attorneys for Plaintiffs

DATED: May 15, 2025

ROB BONTA
Attorney General of California
NORMAN D. MORRISON
Supervising Deputy Attorney General

*/s/ Diana Esquivel **

DIANA ESQUIVEL
Deputy Attorney General
*Attorneys for Defendant State of Cal., by and
through the CHP, Blackwood, Kee, and
Rubalcava*

*The filer, Hang D. Le, hereby attests that all other signatories listed, and on whose behalf the filing is submitted, concur with the filing's content and have authorized the filing.

<u>Witness Name</u>	<u>Party Calling</u>	<u>Time: Direct Exam</u>	<u>Time: Cross Exam.</u>	<u>Description of Testimony</u>
1. Isaiah Kee (i-zay-a key)	Plaintiff, & State Defendant	1.5 hrs P	4 hrs SD	Involvement in Decedent's pursuit, stand-off & shooting; training & experience; information known to him at the time of the incident; facts and circumstances known to him surrounding the incident; his recorded interview and deposition testimony; hypothetical questions; and all related liability questions. (Liability)
2. Bernardo Rubalcava (beh-r-NAR-doh roo-ball-Kava)	Plaintiff, & State Defendant	1.5 hrs P	3 hrs SD	Involvement in Decedent's pursuit, stand-off & shooting; training & experience; information known to him at the time of the incident; facts and circumstances known to him surrounding the incident; his recorded interview and deposition testimony; hypothetical questions; and all related liability questions. (Liability)
3. Michael Blackwood (MY-kuhl black-wood)	Plaintiff, & State Defendant	1.5 hrs P	3 hrs SD	Involvement in Decedent's pursuit, stand-off & shooting; training & experience; information known to him at the time of the incident; facts and circumstances known to

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				him surrounding the incident; his recorded interview and deposition testimony; hypothetical questions; and all related liability questions. (Liability)
4. Jake Adams (jayk a-duhms)	Plaintiff, & State Defendant	1.5 hrs P	3 hrs SD	Involvement in decedent's pursuit, stand-off & shooting; training & experience; information known to him at the time of the incident; facts and circumstances known to him surrounding the incident; his recorded interview and deposition testimony; hypothetical questions; and all related liability questions. (Liability)
5. Robert Vaccari (ra-bert vak-ka-ree),	Plaintiff, & State Defendant	1.0 hr P	3 hrs SD	Involvement in Decedent's pursuit, stand-off & use of non-lethal force; training & experience; information known to him at the time of the incident; facts and circumstances known to him surrounding the incident; his recorded interview and deposition testimony; hypothetical questions; and all related liability questions. (Liability)

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6. Jonathan Wayne Botten, Sr. (jon-uh-thuhn w-AI-n bat-en)	Plaintiff	0.75 hr P	.75 hrs SD	Mr. Botten will testify to his observations regarding the facts and circumstances relating to the incident; injuries sustained by him and his family members as a result of the shooting. (Liability)
7. Betzabeth Gonzalez (bET-zuh-BEHTH gon-zaa-lis)	Plaintiff	0.75 hr P	0.75 hrs SD	Ms. Gonzalez will testify to her observations regarding the facts and circumstances relating to the incident. (Liability)
8. Erin Mangerino (eh-ruhn mAHN-juh-REE-no),	Plaintiff, & State Defendant	0.5 hr P	0.5 hrs SD	Neighbor. Observation of Puga's interaction with law enforcement & video taken. Will testify to her observations regarding the facts and circumstances relating to the incident. (Liability)
9. Robert Ripley (rob-urht rip-lee)	Plaintiff	1 hr P	1 hr SD	Detective Ripley is a detective for the County of San Bernardino Sheriff's Department and is the detective who processed the scene of the incident. He will testify to his investigation and findings of the subject scene, the physical evidence obtained, the documenting of evidence locations at the scene as

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				well as preparation of his report. (Liability)
10. Christopher Hermosillo (kris-two-fer her-mo-SEE-yo)	Plaintiff	1 hr P	0.5 hr SD	Mr. Hermosillo is a Crime Scene Specialist for the County of San Bernardino. Mr. Hermosillo participated in the investigation after the incident. He is expected to testify as to his investigation and findings, including evidence found and processed at the scene as well as his observations of Decedent's autopsy, findings from Decedent's autopsy, and evidence collected at Decedent's autopsy. (Liability)
11. Timothy Jong, MD (Ti-muh-thee jONG)	Plaintiff, & State Defendant	1 hr P	0.75 hrs SD	Performance and results of Puga's autopsy. Dr. Jong was the County Medical Examiner who performed Puga's autopsy. He will testify to the autopsy he performed, the external examination of Puga's body, his observations of the wounds found on Puga's body, the nature and extent of Puga's injuries, the cause and manner of the injuries found on Puga, the trajectory of the

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				gunshot wounds, the internal examination of Puga's body, any other autopsy findings, cause and manner of death, whether gunshot wounds are consistent with specific body positioning, and any hypotheticals posed to him. (Liability & damages)
12. Roger Clark (rO-juh-r klark)	Plaintiff	1.5 hrs P	1 hr SD	Mr. Clark is Plaintiffs' retained police practices expert. He will testify to his background, experience, training and POST standards, as well as his opinions regarding the officers' conduct, tactics, and use of force pursuant to standard police practices and training, and answer any hypotheticals posed to him. (Liability)
13. Jasmine Hernandez (jaes-min hur-nan-dez)	Plaintiff	0.5 hr P	0.5 hr SD	Plaintiff's mother. Knowledge of Puga's relationship with I.H. She will testify to the relationship I.H. had with his father, and the loss of love, comfort, society and support suffered by I.H. by the loss of his father. (Damages)

Commented [DE1]: In light of the Court's ruling on MSJ, State Defs do not intend to call the GALs. Do plaintiffs?

Commented [HL2R1]: Plaintiffs intend to call GALs for damages only

<u>Witness Name</u>	<u>Party Calling</u>	<u>Time: Direct Exam</u>	<u>Time: Cross Exam.</u>	<u>Description of Testimony</u>
14. Lydia Lopez (lih-dee-uh lo-pez)	Plaintiff	0.5 hr P	0.5 hr SD	Plaintiff's mother. Knowledge of Puga's relationship with A.L. She will testify to the relationship A.L. had with her father, and the loss of love, comfort, society and support suffered by A.L. by the loss of her father. (Damages)
15. Maria Cadena (muh-ree-uh ka-den-a)	Plaintiff	0.5 hr P	0.5 hr SD	Plaintiff's mother. Knowledge of Puga's relationship with L.C. Ms. Lopez is the natural mother and guardian ad litem of Plaintiff L.C. She will testify to the relationship L.C. had with her father, and the loss of love, comfort, society and support suffered by L.C. by the loss of her father. (Damages)
16. Gabriela Salas (gab-ri-ela sal-as)	Plaintiff (damages only) & State Defendant	0.5 hr P	0.5 hr SD	Puga's sister. Observation of Puga's possession of gun & his relationship with plaintiffs She will testify to the minor children's relationships with Puga and the loss of love, comfort, society and support they suffer as a result of his death. (Liability and damages)

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17. Annabelle Botten (aN-uh-bel baut-ten)	State Defendant	1 hr	0.5 hr P	Neighbor. Observation of Puga's interaction with law enforcement (Liability)
18. Edward Mangerino (ed-Werd mAHN-juh-REE-no)	State Defendant	1.5 hr	0.5 hr P	Neighbor. Observation of Puga's interaction with law enforcement & video taken. (Liability)
19. Tammy Goodson (ta-mee gUUD-sun)	State Defendant	1 hr	0.5 hr P	Neighbor. Observation of Puga's interaction with law enforcement. (Liability)
20. Alejandro Tovar (ah-leh-Hahn-droh tho-vahr)	State Defendant	2 hr	0.5 hr P	CHP Officer. Investigation into the 4/16/21 freeway shooting involving Puga. (Liability)
21. Edward Hernandez (ed-Werd hur-nan-dez),	State Defendant	1 hr	0.75 hr P	SBCSD Detective. Investigation of Puga's shooting. (Liability)
22. Erin A. Spargo Ph.D (Eh-ruhn SPAR-go)	State Defendant	1hr	0.75 hr P	Forensic Toxicologist who performed and obtained results of toxicology tests/report (Liability)
23. Lucien C. "Luke" Haag (loo-sheen "Lu-k" Hah-ch)	State Defendant	2 hr	1.5 hr P	Expert opinion on ballistics & trajectories. (Liability)

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24. Alexander Jason (al-ehk-SAHN-der JAY-sahn)	State Defendant	2 hr	1 hr P	Expert opinion on crime scene reconstruction. (Liability)
25. Kris Mohandie PH.D. (kris moh-ahn-dee or mah-ahn-dee)	State Defendant	2 hr	1.5 hr P	Expert opinion on "suicide by cop". (Liability and damages)
26. Richard Franklin Clark, Jr., M.D. (rih-churd frang-kluhn klark)	State Defendant	2 hr	1 hr P	Expert opinion of Puga's intoxication. (Liability)
27. Joshua Peter Visco, Esq. (jAH-shuh-wuh pee-tr vees-ko)	State Defendant	2 hr	1 hr P	Expert opinion of Puga's pending & anticipated criminal charges. (Liability and damages)
28. Greg Meyer (g-r-eh-g my-er)	State Defendant	4 hrs	2 hrs P	Expert opinion on police practices; reasonableness of State Defs.' use of force. (Liability)
29. Salvador Hernandez Pacheco (sal-ba-door her-nan-dez pa-che-ko)	State Defendant	1 hrs	0.75 hr P	Victim witness. Interaction with Puga on 4/16/21 and resulting freeway shooting. (Liability)
30. Jeremy Pedergraft (jer- e-mi ped-er-graft)	State Defendant	1 hr	1 hr P	Paramedic. Examination of Puga & declared him dead at scene. (Liability and damages)

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31. A. McAllister (mak-al-ister)	State Defendant	2 hrs	1.5 hr P	CHP MAIT Investigator. Investigation of Puga's shooting. (Liability)
32. J. Carter (kart-er)	State Defendant	2 hrs	1.5 hr P	CHP MAIT Team Leader. Investigation of Puga's shooting. (Liability)